

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT -- REVISED

PERMITTEE

Reum Corporation  
Attn: Rolando Puc  
3600 Sunset Avenue  
Waukegan, Illinois 60087

Application No.: 04060099

I.D. No.: 097190ADF

Applicant's Designation:

Date Received: May 1, 2006

Subject: Electronic Components Manufacturing Plant

Date Issued: May 12, 2006

Expiration Date: April 8, 2010

Location: 3600 Sunset Avenue, Waukegan

This permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of two automotive button painting lines, #1 and #2, each comprised of three paint booths controlled by filters and curing oven, one plastic parts coating line #3 comprised of one paint booth and curing/drying oven, plastic molding operations, pad printing operations and paint burn-off oven pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 100 tons/year for volatile organic material (VOM), 10 tons/year for a single hazardous air pollutant (HAP) and 25 tons/year for totaled HAPs). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to the initial issuance of a FESOP to this source, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permit issued for this location.
- 2a. This permit is issued based on this source not being a participating source in the Emissions Reduction Market System (ERMS), 35 Ill. Adm. Code Part 205, pursuant to 35 Ill. Adm. Code 205.200. This is based on the source's actual VOM emissions during the seasonal allotment period from May 1 through September 30 of each year being less than 10 tons and the source's baseline emissions also being less than 10 tons.
- b. The Permittee shall maintain the following records to allow the confirmation of actual VOM emissions during the seasonal allotment period:

- i. Records of operating data and other information for each individual emission unit or group of related emission units at the source, as appropriate, to determine actual VOM emissions during the seasonal allotment period;
    - ii. Records of the VOM emissions, in tons, during the seasonal allotment period, with supporting calculations, for each individual emission unit or group of related emission units at the source, determined in accordance with the procedures that may be specified in this permit; and
    - iii. Total VOM emissions from the source, in tons, during each seasonal allotment period, which shall be compiled by November 30 of each year.
  - c. In the event that the source's VOM emissions during the seasonal allotment period equal or exceed 10 tons, the source shall become a participating source in the ERMS and beginning with the following seasonal allotment period, shall comply with 35 Ill. Adm. Code Part 205, by holding allotment trading units (ATUs) for its VOM emissions during each seasonal allotment period, unless the source obtains exemption from the ERMS by operating with seasonal VOM emissions of no more than 15 tons pursuant to a limitation applied for and established in a Clean Air Act Permit Program (CAAPP) permit or a Federally Enforceable State Operating Permit (FESOP).
  - d. Pursuant to 35 Ill. Adm. Code 205.316(a), any participating or new participating source shall not operate without a CAAPP permit or FESOP. Pursuant to 35 Ill. Adm. Code 205.316(a)(2), if a participating or new participating source does not have a CAAPP permit containing ERMS provisions and the source elects to obtain a permit other than a CAAPP permit, the source shall apply for and obtain a FESOP that contains, in addition to other necessary provisions, federally enforceable ERMS provisions, including baseline emissions, allotment for each seasonal allotment period, identification of any units deemed to be insignificant activities for purposes of the ERMS, emissions calculation methodologies, and provisions addressing all other applicable requirements of 35 Ill. Adm. Code Part 205.
3. Two coating lines are subject to the volatile organic materials (VOM) emission limitations of 35 Ill. Adm. Code 218.204(n)(1)(A)(i) and (ii). The VOM content of the coatings, as applied, shall not exceed 4.1 and 3.8 lb of VOM per gallon of coating, respectively, excluding water and any compounds which are specifically exempted from the definition of VOM.
  4. The VOM emissions from shall not exceed 2.0 tons/month and 20.0 tons/year the coating lines #1 and #2 (combined) 0.5 tons/month and 4.8 tons/year from coating line #3. The VOM emissions shall be calculated using the following equation:

$$E = \sum (P_i \times C_i) / 2,000,$$

where

E - VOM emissions (tons)

P<sub>i</sub> - coating and solvent usage (gallons)

C<sub>i</sub> - VOM content of coating and solvent used (lbs/gallon)

These limits are based on the maximum production rate. Compliance with annual limits shall be determined from a running total of 12 months of data.

5. This permit is issued based on negligible emissions of volatile organic material from the plastic molding and pad printing operations. For this purpose, emissions from each emission source, shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
6. Operation and emissions of the natural gas fired dryers shall not exceed the following limits:

Natural Gas Usage: 4.0 mmscf/month, 40.0 mmscf/year

<u>Pollutant</u>	<u>Emission Factor</u> (Lbs/mmscf)	<u>Emissions</u>	
		(Tons/Mo)	(Tons/Yr)
Nitrogen Oxides (NO <sub>x</sub> )	100	0.2	2.0
Carbon Monoxide (CO)	84	0.2	1.7
Volatile Organic Material (VOM)	5.5	---	0.1

These limits are based on the maximum operating rate and standard emission factors given by AP-42. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 months of data.

7. The operations and particulate matter (PM) emission from two paint lines shall not exceed the following limits:

<u>Paint Usage</u>		<u>Solids</u> <u>Content</u> (Wt. %)	<u>Overspray</u> (%)	<u>Control</u> <u>Efficiency</u> (%)	<u>PM Emissions</u>	
(Tons/Mo)	(Tons/Yr)				(Tons/Mo)	(Tons/Yr)
13.0	133.0	40	75	95	0.2	2.0

These limits are based on the maximum production rate. Compliance with annual limits shall be determined from a running total of 12 months of data.

8. This permit is issued based on negligible emissions of particular matter from the paint burn-off oven. For this purpose, emission shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.

9. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a Clean Air Act Permit Program permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a Clean Air Act Permit Program permit from the Illinois EPA.
- 10a. The Permittee shall maintain daily records of the following items:
  - i. The name and identification number of each coating as applied on each coating line; and
  - ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each coating lines.
- b. The Permittee shall maintain monthly records of the following items separately for coating lines #1 and #2 (combined) and line #3:
  - i. The name and usage (gallons/month, gallons/year) of each coating and cleanup solvent;
  - ii. The VOM and HAP content of each coating and cleanup solvent;
  - iii. VOM and HAP emissions with supporting calculations (tons/month, tons/year).
11. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to the Illinois EPA request for records during the course of a source inspection.
12. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.
13. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

It should be noticed that this permit has been revised to include operation of coating line #3 described in Construction Permit 06040029.

This revision does not relax monitoring, recordkeeping, or reporting requirements contained in federally enforceable conditions of this permit. These permit conditions assure that this source would not be a major source for purpose of CAAPP.

If you have any questions on this permit, please contact Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E.  
Manager, Permit Section  
Division of Air Pollution Control

DES:VJB:psj

cc: Illinois EPA, FOS Region 1  
Lotus Notes

### Attachment A-Emissions Summary

This attachment provides a summary of the maximum emission from the electronic components manufacturing plant, operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the levels, 100 tons per year of VOM, 10 tons per year of a single HAP and 25 tons per year of combined HAPs at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, coatings used and control measures are more effective than in this permit.

<u>Emission Units</u>	E M I S S I O N S (Tons/Year)					
	<u>VOM</u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>PM</u>	<u>Single</u>	<u>Total</u>
Three Paint Lines	24.80			2.00	< 10	< 25
Molding Operations	0.44					
Printing Operations	0.44					
Paint Burn-Off Oven				0.44		
Gas-Fired Equipment	<u>0.10</u>	<u>2.0</u>	<u>1.7</u>			
Total	25.8	2.0	1.7	2.44	< 10	< 25

VJB:psj